Draft River Mile 10.9 Removal Action Perimeter Air and Noise Monitoring Plan, Lower Passaic River Study Area prepared May 2013 – Additional EPA Comments

- **Section 1.1**- Here and throughout the document reference is made to protecting "the public living and working adjacent to the removal area". It is recommended that the plan clarify the individual receptors i.e., young children, adolescents, and adults, as well as park workers who will be protected.

  This section also indicates that the removal actions will occur six days per week for 12 hours per day. The document should clarify what activities are anticipated in the remaining 12 hour timeframe when removal actions are not anticipated and also on the 7^{th} day. The discussion should clarify whether monitoring will be conducted during the remaining times when the potential exposures are possible if the area is not covered.

- **Section 1.3**- The first paragraph on page 2 suggests that there are no potential health effects from exposures during this work because of the short time-frame. Please state that adverse health effects are not anticipated.

  On Page 3, the text states that periodic H_2S monitoring will be conducted, though real-time monitoring is planned. Please revise.

- **Section 3.1**-The upwind monitor is positioned at a fixed location based on historical meteorological wind data which could cause issues should prevailing winds at the site change. Meteorological data collected on site should be used to determine if the upwind monitor is correctly positioned during removal actions or if measures need to be taken to obtain the correct background information.

- **Section 3.1-** A description of data quality control in necessary. Air monitors are being physically moved and this could lead to issues with monitors and determining baseline concentrations.

- **Section 3.1.2**- Provide predetermined locations for Mobile #1 and indicate them on Figure 1. Clarification is required on how or when random locations will be determined.

- **Section 3.1.2 and Section 3.2:** These sections appear to contradict each other. Section 3.1.2 implies that monitoring will occur at 3 locations (Mobile #1, DW#1 and DW #2) at all times, but the table in Section 3.2 shows that monitoring will occur at only Mobile #1 and DW #1. Please confirm that monitoring will occur at all 3 locations.

- **Sections 3.2.1, 3.2.2 and 3.2.3**- We would like to discuss the proposed instrumentation prior to implementation. There may be better options than those proposed.

- **Section 3.2.4**- Please clarify whether the noise monitoring is taking place at DW#1,2, and 3, or at new locations. If there locations are different from the other monitoring stations, include them on Figure 1 or a new figure. Also, please specify the hours that noise monitoring will be conducted.

- **Section 3.3**- Reference is made to human health based criteria, but no details are provided. Please refer to Section 3.7 (and/or a more appropriate section) here.

  The composite sampling schedule requires contingency plans should levels exceed human health based criteria. This could include having to change the composite schedule to include multiple days of sampling for the COPCs until they reach acceptable levels. Without a plan for using the measured results of the composite samples there will be no way to determine if actions taken to address identified issues are actually working.

- **Section 3.6**- Table 3-2 needs to include the barge transport monitoring.

- **Section 4.1**- It is suggested that the VOCs warning level response to be: Work activities are temporarily suspended and the source of VOCs will be investigated. If necessary corrective measures will be implemented. Activities may continue after VOC concentrations fall below 5 ppm over a 15-minute period.

  The dust/PM_{10} warning and action levels be reduced to 100 $\mu g/m^3$ greater than background for the 15-minute period and 150 $\mu g/m^3$ greater than background for the 15-minute period. These are levels that are found in New York State Department of Health Generic Community Air Monitoring Plan and can be applied to this site.

  A few six-liter SUMMA canisters should be readily available for TO-15 analysis should the VOC action level be exceeded. These could also be useful should odor become an issue, and can be set to monitor for a 24-hour period, as appropriate.

- **Table 4.2**. The PCBs values need to be updated to account for non-cancer health effects. In addition, the basis for selecting a value of 2X for the action level requires clarification. The action level is typically set at 80% of the overall level and action is taken when the value is exceeded.

- **Section 4.4**- Please clarify the following sentence "Details of the increased air monitoring parameter above the warning value will be documented and will include, …" It is not clear if this is referring to monitored levels that exceed action and warning levels.

- **Table A-1**-

  Mercury. The value listed in IRIS for elemental mercury with a Reference Concentration of 3×10^{-4} mg/m3 is a chronic value and not a subchronic value as suggested in Table 3.1.

Polychlorinated Biphenyls. Based on the cancer assessment, an extrapolation from the oral non-cancer toxicity value to an inhalation Reference Concentration can be calculated. The resulting concentration in air associated with a non-cancer HI = 1 is 0.11 ug/m3 based on a 24 hour exposure for a young child. This value is recommended in place of the 4 ug/m3 provided in this table, and is consistent with what has been used at other sites.

- **Table A-3**- If the potential exists for the resident to continue to be exposed to contaminants from RM 10.9, then the application of a Exposure Time of 0.5 does not seem appropriate. The text needs to clarify the actions that will assure that the resident is not exposed for a period of longer than 12 hours.

- **Table A-4**. The information in this table is confusing regarding its application. For example, children and adults may be exposed to contaminants at the park yet the values identified are significantly higher than that for the adult worker. The text should clarify how these numbers will be applied. It would seem that meeting the adult worker concentrations will also protect the child recreator.

- **General Comment**- The document does not provide a mechanism for reporting concerns or reporting results from sampling. This should be addressed, either directly here or through reference to another portion of the design.